

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

STATE OF MARYLAND; STATE OF DELAWARE;
STATE OF CALIFORNIA; STATE OF COLORADO;
STATE OF ARIZONA; STATE OF CONNECTICUT;
DISTRICT OF COLUMBIA, STATE OF HAWAI‘I;
STATE OF ILLINOIS; OFFICE OF THE
GOVERNOR *ex rel.* Andy Beshear, in his official
capacity as Governor of the COMMONWEALTH OF
KENTUCKY; STATE OF MAINE;
COMMONWEALTH OF MASSACHUSETTS;
PEOPLE OF THE STATE OF MICHIGAN; STATE
OF MINNESOTA; STATE OF NEVADA; STATE OF
NEW JERSEY; STATE OF NEW MEXICO; STATE
OF NEW YORK; STATE OF NORTH CAROLINA;
STATE OF OREGON; JOSH SHAPIRO, in his
official capacity as Governor of the
COMMONWEALTH OF PENNSYLVANIA; STATE
OF RHODE ISLAND; STATE OF VERMONT;
STATE OF WASHINGTON; STATE OF
WISCONSIN;

Plaintiffs,

v.

CORPORATION FOR NATIONAL AND
COMMUNITY SERVICE, operating as AmeriCorps;
and JENNIFER BASTRESS TAHMASEBI, in her
official capacity as Interim Head of the Corporation
for National and Community Service;

Defendants.

Civ. No. 25-cv-01363 (DLB)

**CONSENT MOTION FOR EXPEDITED BRIEFING AND SCHEDULING OF A
HEARING ON PLAINTIFFS’ MOTION FOR PRELIMINARY INJUNCTION**

Plaintiff States hereby move, pursuant to Federal Rule of Civil Procedure 6(c)(1), Local Civil Rule 105.2, and the Court's inherent power to manage its docket, for an order establishing a briefing schedule on Plaintiffs' Motion for Preliminary Injunction so that briefing can be completed by May 16, 2025 and a hearing held during the week of May 19, 2025. The parties conferred, through counsel, and Defendants consent to the relief requested in this motion.

Absent action on this motion, under the Local Rules, Defendants' Response to the Motion would be due on May 20, 2025, and Plaintiffs' Reply would be due on June 3, 2025. Plaintiff States seek expedited briefing of their motion due to the need to address this matter on a schedule that will mitigate the ongoing irreparable harms Plaintiff States allege as a result of the Defendants' constitutional, statutory, and administrative law violations, as described in both the Complaint and the Memorandum in Support of Plaintiffs' Motion for Preliminary Injunction filed contemporaneously herewith.

Expediting the briefing schedule for Plaintiffs' motion will enable the court to mitigate the imminent and ongoing harms. Plaintiff States, therefore, request an order requiring Defendants to file any response to Plaintiffs' Motion for Preliminary Injunction on or before Tuesday, May 13, 2025, and requiring Plaintiffs to file any reply on or before Friday, May 16, 2025. In addition, Plaintiff States respectfully request that the Court set a hearing on the Plaintiffs' Motion for a Preliminary Injunction during the week of May 19, 2025.

Dated: May 6, 2025

Respectfully submitted,

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** Motion for admission pro hac vice forthcoming*

CERTIFICATE OF SERVICE

I certify that on May 6, 2025, I filed the foregoing document via CM/ECF and thereby served all parties who have appeared through counsel on the Court's electronic docket.

For Plaintiff States whose counsel's motions for admission pro hac vice are forthcoming, I served the foregoing document via email to those counsel.

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